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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGINA CASTRO,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, CHAD
MELTON, and DOES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-02810-WLH-MARx

**AMENDED JOINT RESPONSE TO
OSC and REQUEST TO APPEAR
VIA ZOOM**

OSC re Dismissal:
Date: August 22, 2025
Time: 1:00 p.m.

Pursuant to this Court's April 24, 2025 Order (Doc. 55), by and through their attorneys of record, Plaintiff REGINA CASTRO and Defendants COUNTY OF LOS ANGELES and CHAD MELTON, hereby submit the following Response to Order to Show Cause.

1. This officer-involved shooting death incident occurred on March 13, 2022. The Complaint was filed on April 14, 2023. (Doc. 1.)

2. The Parties participated in a mediation on December 15, 2023, with mediator Judge Joseph Biderman (Ret.).

3. On December 27, 2023, the Parties filed their Joint Status Report Regarding Conditional Settlement of Entire Action and Request to Continue and/or Vacate all Dates. (Doc. 44).

4. On December 27, 2023, the Court set an Order to Show Cause re

1 Dismissal for March 22, 2024, and vacated all dates and deadlines. (Doc. 45).

2 5. On February 27, 2024, Plaintiff and her counsel signed the Release in
3 Full Settlement and Compromise Agreement.

4 6. On March 6, 2024, the Parties filed their Response to OSC and
5 Stipulation to Continue OSC re Dismissal, whereby the County estimated that the
6 approval process will take approximately nine (9) months. (Doc. 46). To date it has
7 not been 18 months since the executed Settlement and Compromise Agreement.

8 7. On March 18, 2024, the Court continued the OSC re Dismissal to
9 January 17, 2025. (Doc. 48).

10 8. On January 13, 2025, following stipulation of the parties, the Court
11 again continued the OSC re Dismissal to April 25, 2025. (Doc. 51).

12 9. On April 24, 2025, following stipulation of the parties, the Court again
13 continued the OSC re Dismissal to August 22, 2025. (Doc. 55).

14 10. The settlement is subject to the County's approval process, which
15 entails final approval by the Contract Cities Claims Board and the County of Los
16 Angeles Board of Supervisors.

17 11. Once the LASD completes its internal review of a matter, it forwards
18 its required documentation to the LASD Risk Management Bureau and the CEO of
19 Risk Management for Los Angeles County for review. The LASD internal review
20 process was completed in mid-July 2025, after which the required documents were
21 forwarded to the LASD Risk Management Bureau and the CEO of Risk
22 Management for Los Angeles County.

23 12. Upon the concurrence of the CEO of Risk Management for Los
24 Angeles County, the documentation is processed through the LASD chain of
25 command.

26 13. Once the final signature process for LASD is complete, the
27 documentation is provided to the CEO of Risk Management for Los Angeles County
28 for final review and signature, at which time the matter can be placed on the

1 Contract Cities Claims Board agenda. Defendants believe that that the CEO will
2 issue a determination in sufficient time to have the matter placed on the September
3 11 or October 2 agenda; however, this has not yet been confirmed.

4 14. After approval by the Contract Cities Claims Board, the matter will
5 then be placed on the Public Safety Cluster Review agenda, which is typically
6 within 30 days. Based on Defendants' expectations, that will likely be on or around
7 November 2, 2025.

8 15. After the Cluster Agenda has been advised of the settlement, the matter
9 will go before the County Board of Supervisors for approval, which is typically
10 within 30 days. Based on Defendants' expectations, that will likely be on or around
11 December 2, 2025.

12 16. Based on Defendants' understanding and belief, the Los Angeles
13 County Sheriff's Department Risk Management Bureau has been restructured,
14 which created a further backlog of matters awaiting settlement approval. Along
15 with the restructuring was the implementation of a new format and structure for
16 documentation required for a matter to proceed to the Contract Cities Claims Board
17 for settlement approval.

18 17. Then, if approved by the Board of Supervisors, that Plaintiff will
19 receive the settlement funds within 30 days of the final approval.

20 18. If the OSC is heard on August 22, 2025, the parties request that it be
21 held remotely via Zoom.

22
23 Respectfully submitted,

24 DATED: August 15, 2025

LAW OFFICES OF DALE K. GALIPO

25
26 By: /s/

Dale K. Galipo, Esq.

27 Marcel F. Sincich, Esq.

28 *Attorneys for Plaintiff REGINA CASTRO*

1 DATED: August 15, 2025

CARPENTER, ROTHANS & DUMONT

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3
4 By: /s/
Jill Williams
5 Scott J. Carpenter
6 *Attorneys for Defendant* COUNTY OF LOS
ANGELES
7

8 DATED: August 15, 2025

SEKI, NISHIMURA & WATASE, PLC

9
10 By: /s/
11 Janet L. Keuper
12 *Attorneys for Defendant* CHAD MELTON
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